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February 6, 1998

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Guy M. Hicks
General Counsel

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Comments on Technical Workshops. A copy has been provided to counsel of record.

Very truly yours,

A handwritten signature in black ink, appearing to be "Guy M. Hicks", written over a horizontal line.

Guy M. Hicks

GMH:ch

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: ***BellSouth's Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996***

Docket No. 97-00309

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
COMMENTS ON TECHNICAL WORKSHOPS**

I. INTRODUCTION

Pursuant to the January 27, 1998 Report and Recommendation adopted by the Tennessee Regulatory Authority ("TRA"), BellSouth Telecommunications, Inc. ("BST") respectfully files its comments concerning the technical workshops proposed by the TRA in this docket. As a general matter, BST believes that these workshops should be informal and be for the benefit of the Directors and the TRA Staff; they should not be adversarial or serve as a substitute for discovery by the Intervenors.

II. DISCUSSION

A. OSS Workshop

BST proposes to conduct a demonstration of the OSS electronic interfaces it offers to Competitive Local Exchange Carriers ("CLECs"). This would include: (1) the Local Exchange Navigation System ("LENS"), through which BST offers real-time, interactive access to pre-ordering information; (2) a customized pre-ordering interface called "EC-LITE," which BST developed for AT&T; (3) BST's Electronic Data Interchange ordering interface ("EDI-PC"); and (4) the Trouble Analysis and Facilitation Interface ("TAFI"), which is an interactive maintenance and repair interface. BST requests that its subject matter experts be permitted

to present a live demonstration of these interfaces, after which they will be available to answer questions from the Directors, the Staff, and the parties.

BST believes that the workshop should not be conducted as an evidentiary hearing. Rather, it should be more in the nature of an informal technical conference. The TRA has conducted such informal conferences in the past, particularly with respect to the cost models introduced in Docket 97-01262. Such an informal conference will allow technical issues to be addressed among the various parties and will promote a fuller and more open discussion of the issues.

Furthermore, BST believes that it would be beneficial for the Directors and the TRA Staff to hear from CLECs, particularly AT&T, MCI, and Sprint, concerning their OSS development efforts. Some of the interfaces BST has developed for CLECs require development work by the CLECs on their side of the interface in order to ensure full OSS functionality. Unless these CLECs describe the status of their development efforts, the TRA will be presented with only one-half of the OSS picture.

BST also extends an invitation to the Directors, members of the TRA Staff, and the parties to visit one of BST's Local Carrier Service Centers ("LCSC"), which are located in Birmingham, Alabama, and Atlanta, Georgia. Such a visit would allow the TRA to observe first-hand the resources BST has devoted to handling service orders from CLECs and the manner in which such orders are provisioned. Several representatives of other State Commissions in BST's region have made similar visits to the LCSC.

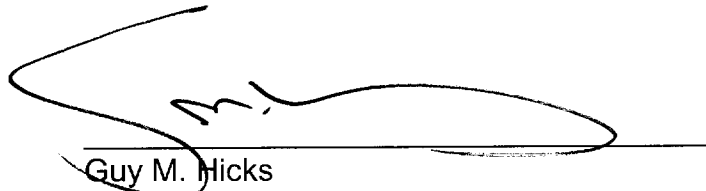
B. Performance Measurements Workshop

BST proposes to have its subject matter experts make a presentation about the performance measurements in BST's Statement of Generally Available Terms and Conditions

The presentation will include a description of each proposed measurement and a review of available data reflecting such measurements. After the presentation, BST's subject matter experts will be available to answer questions from the Directors, the Staff, and the parties. As with the OSS technical workshop, BST believes that the performance measurements workshop should be informal in order to promote a fuller and more open discussion of the issues.

Respectfully submitted,

BellSouth Telecommunications, Inc.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 1998, a copy of the foregoing document was served on the parties of record via U. S. Mail, postage pre-paid, addressed as follows:

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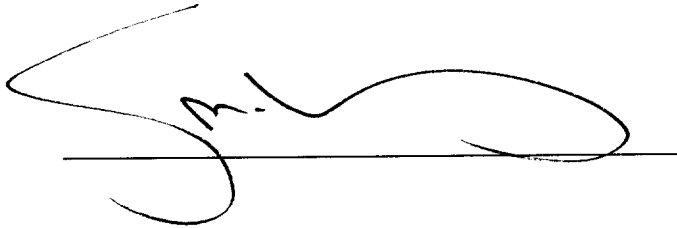
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